

CSD 1182 [07/01/18]

Name, Address, Telephone No. & I.D. No.

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Attorneys for Richard M Kipperman

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF CALIFORNIA

325 West F Street, San Diego, California 92101-6991

In Re

SAN DIEGO HOSPICE & PALLIATIVE CARE CORPORATION,

BANKRUPTCY NO. 13-01179-MM1

Tax I.D.(EIN)#: 95-3125765 /S.S.#:XXX-XX- _____ Debtor.

NOTICE OF MOTION FOR ENTRY OF A FINAL DECREE

TO: ALL PARTIES IN INTEREST

You are herewith served with the attached Motion by Liquidating Trustee, Movant,
for: ENTRY OF A FINAL DECREE CLOSING THE CASE.

and any accompanying declarations.

If you object to the Court granting the relief requested in the Motion:

- You are required** to obtain a hearing date and time from the appropriate Courtroom Deputy for the judge assigned to this bankruptcy case. Determine which deputy to call by looking at the Bankruptcy Case No. in the above caption of this notice. If the case number is followed by the letters:

-	MM	-	call (619) 557-7407	-	DEPARTMENT ONE (Room 218)
-	LA	-	call (619) 557-6594	-	DEPARTMENT TWO (Room 118)
-	LT	-	call (619) 557-6018	-	DEPARTMENT THREE (Room 129)
-	CL	-	call (619) 557-6019	-	DEPARTMENT FIVE (Room 318)
- Within fourteen (14)¹ days from the date of service of the motion**, you are further required to serve a copy of your **Declaration in Opposition to Motion** and separate **Request and Notice of Hearing** [Local Form CSD 1184²] upon the undersigned moving party, together with any opposing papers. The opposing declaration must be signed and verified in the manner prescribed by FRBP 9011, and the declaration must:

¹Depending on how you were served, you may have additional time for response. See FRBP 9006.²You may obtain Local Form CSD 1184 from the office of the Clerk of the U.S. Bankruptcy Court.**[Continued on Page 2]**

- a. identify the interest of the opposing party; and
 - b. state, with particularity, the grounds for the opposition.
3. **You must** file the original and one copy of the Declaration and Request and Notice of Hearing with proof of service with the Clerk of the U.S. Bankruptcy Court at 325 West F Street, San Diego, California 92101-6991, no later than the next business day following the date of service.

If you fail to serve your "Declaration in Opposition to Intended Action" and "Request and Notice of Hearing" within the 14-day¹ period provided by this notice, no hearing will take place, you will lose your opportunity for hearing, and the debtor or trustee may proceed to take the intended action.

DATED: June 21, 2019

/s/ Jeffrey P. Nolan

Attorney for Moving Party

Jeffrey P. Nolan

CERTIFICATE OF SERVICE

I, the undersigned whose address appears below, certify:

That I am, and at all relevant times was, more than 18 years of age;

That on the 21st day of June, 2019, I served a true copy of the within NOTICE OF MOTION, together with the following pleadings [describe any other papers] on the following persons listed below by the mode of service shown below:

List additional papers: MOTION FOR ENTRY OF FINAL DECREE CLSOING THE CHAPTER 11 CASES; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF RICHARD M KIPPERMAN IN SUPPORT THEREOF

1. To Be Served by the Court via Notice of Electronic Filing ("NEF"):

Under controlling Local Bankruptcy Rules(s) ("LBR"), the document(s) listed above will be served by the court via NEF and hyperlink to the document. On June 21, 2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the e-mail address(es) indicated and/or as checked below:

☒ Attorney for Debtor (or Debtor), if required:

☐ Chapter 7 Trustee:

<input checked="" type="checkbox"/> For Chpt. 7, 11, & 12 cases:	<input type="checkbox"/> For ODD numbered Chapter 13 cases:	<input type="checkbox"/> For EVEN numbered Chapter 13 cases:
UNITED STATES TRUSTEE ustp.region15@usdoj.gov	THOMAS H. BILLINGSLEA, JR., TRUSTEE Billingslea@thb.coxatwork.com	DAVID L. SKELTON, TRUSTEE admin@ch13.sdcoxmail.com dskelton13@ecf.epiqsystems.com

CSD 1182 (Page 3) [07/01/18]

2. **Served by United States Mail:**

On June 21, 2019, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing accurate copies in a sealed envelope in the United States Mail via 1) first class, postage prepaid or 2) certified mail with receipt number, addressed as follows:

☐ Attorney for Debtor (or Debtor), if required:

Via U.S. Mail. See attached service list

3. **Served by Personal Delivery, Facsimile Transmission, Overnight Delivery, or Electronic Mail:**

Under Fed.R.Civ.P.5 and controlling LBR, on _____, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission, by overnight delivery and/or electronic mail as follows:

☐ Attorney for Debtor (or Debtor), if required:

I declare under penalty of perjury under the laws of the United States of America that the statements made in this proof of service are true and correct.

Executed on June 21, 2019

/s/ Myra Kulick
(Typed Name and Signature)

10100 Santa Monica Blvd., 13th Floor
(Address)

Los Angeles, CA 90067
(City, State, ZIP Code)

**In re San Diego Hospice & Palliative
Care Corporation
Case No. 13-01179 (MM11)
2002 Service List**

Office of the U.S. Trustee
402 West Broadway, Suite 600
San Diego, CA 92101-85112

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San Diego Hospice & Palliative
Care Corporation
4311 Third Avenue
San Diego CA 92103

Debtor's Counsel
Jeffrey Isaacs, Esq.
Procopio, Cory, Hargreaves & Savitch
525 B. Street, Suite 2200
San Diego, CA 92101

Internal Revenue Service
Post Office Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service
Insolvency Group 1
880 Front Street
San Diego, CA 92101

Liquidating Trustee
Richard M Kipperman
Corporate Management, Inc.
PO Box 3010
La Mesa, CA 91944.3010

Chief, Special Procedure Section –
Insolvency
P.O. Box 30213
Laguna Niguel, CA 92607-0213

U.S. Department of Justice
Tax Division
Civil Trial Section, Western Division
P.O. Box 683, Ben Franklin Station
Washington, DC 20044

Requests for Special Notice

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Attn: Martin McDonough, CEO
2210 Plaza Dr. #300
Rocklin, CA 95765

Departure
427 C Street, Suite 406
San Diego, CA 92101

GlenBrook Skilled Nursing
Attn: Darolyn Jorgensen-Kares
1950 Calle Barcelona
Carlsbad, CA 92009

Brookwood Crossroads Investors, LLC
Attn: Evelyn M. Murphy
72 Cherry Hill Drive
Beverly, MA 01915

Medline Industries, Inc.
Attn: Shane Reed
1 Medline Place
Mundelein, IL 60060